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Dan Scaife
District Ranger
Coeur d'Alene River Ranger District
2502 East Sherman Avenue
Coeur d'Alene, ID 83814

June 14, 2021

Subject: Honey Badger Environmental Assessment

Dear Mr. Scaife:

I am writing on behalf of the Idaho Conservation League to comment on the Honey Badger Environmental Assessment (EA). ICL has been Idaho's leading voice for conservation since 1973. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting human health and the environment. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development.

While the Idaho Conservation League supports the overall goals and objectives of the Honey Badger Project, we must respectfully observe that the draft EA for the Honey Badger Project falls well short of the spirit and intent of the National Environmental Policy Act (NEPA). While page lengths are not necessarily a yardstick by which to measure the adequacy of a NEPA document, the seventy-five-page Honey Badger EA provides only cursory and generalized conclusions about the effects of the proposed action. There are very few examples in the draft EA where the Forest Service provided quantitative data or made references to the best available scientific information to support the agency's conclusions about the effects of the project. As such, it is not possible for the reader or the responsible decision-maker to decipher how the project will impact the environment or to determine if the proposed action complies with applicable environmental laws.

We also believe that the size and scale of the Honey Badger Project warrants preparation of an environmental impact statement (EIS) in lieu of an EA. An EIS is required when significant environmental effects are expected. The significant threshold on the Idaho Panhandle National Forests (IPNF) seems to be in the neighborhood of three to four thousand acres of commercial timber harvest. In fact, the IPNF used to prepare environmental impact statements for timber sales in this range. Only recently have EAs be prepared by the IPNF for timber sales greater than four thousand acres. If the Forest Service concluded in the past that sales in the three to four thousand-acre range resulted in significant environmental effects, then why is an EA sufficient for these newer, much larger sales?

ICL highly encourages the Forest Service to draft a much more robust EIS for the Honey Badger Project. Our intent in this request is not stop the project from happening. Our intent is to honor the spirit and intent of NEPA which provides an avenue for the public to engage in decisions regarding the use of public natural resources. NEPA also is intended to foster informed decision making by enabling federal agencies and the public to weigh the costs and benefits of a proposed agency action. The draft EA does not meet NEPA's standard of review.

More extensive comments are attached. Please do not hesitate to contact me if you would like to discuss my concerns. I look forward to any opportunity to resolve them.

Sincerely,

Brad Smith
North Idaho Director

Honey Badger Environmental Assessment

National Environmental Policy Act

While we understand the Forest Service's desire to avoid analysis paralysis, we were underwhelmed by the lack of detail in the EA. We could find only limited information about the effects of the proposed action in the draft. The lack of information in the draft EA is not in keeping with the spirit of the NEPA. NEPA is not meant to be an administrative burden. Instead, the purpose of NEPA is to provide the public with an opportunity to be involved in agency decision-making regarding the use and management of public natural resources. The Act is also intended to foster informed environmental decision-making by enabling agencies and the public to weigh a proposed agency action against its environmental consequences.

The Honey Badger EA falls well short of NEPA's purpose because it is nearly impossible for the public and the responsible decision maker to read the document and draw meaningful conclusions about the environmental effects of the Honey Badger Project. Supporting information and analysis is sacrificed for the sake of brevity. For example, the EA does not even discuss in detail the effects of the project to wildlife. The EA states only that no listed species are known to occur in the project area, and "[b]ased on habitat requirements and/or distribution, or project design and/or implementation criteria, there would be no impact to most sensitive wildlife species associated with the Honey Badger project area." (Pages 20, 21).

Instead, the Forest Service refers the reader to Project File W-028, which is inconsistently referred to as the biological evaluation, the biological assessment, or the wildlife analysis in the EA. In any case, this project file provides only a general summary of potential effects to listed and sensitive species. These summaries generally do not quantify suitable habitat or the acreage of habitat implicated by the proposed action. Moreover, the document does not reference the best available scientific information with regard to the affected species in terms of habitat needs, life history, and the effects of land management activities. There are only six references listed at the end of the document, all of which are Forest Service management plans, policies, or species lists. It is not evident that the Forest Service drew from any peer-reviewed scientific literature in analyzing the effects of the proposed action to wildlife.

The EA similarly lacks any information about the effects of the project to fish. In fact, the EA doesn't even list the fish species present in the project area or their status. Moreover, while the EA indicates that the Forest Service used the Water Erosion Prediction Project (WEPP) to model the amount of sediment that would be generated by the proposed action, there is no discussion regarding how much sediment would be generated in each of the four watersheds in the project area. The EA states only that "[o]ver the long-term the decrease in sediment delivery and improved riparian condition would maintain or increase the quality of fish habitat, trending toward desired conditions" (Page 48). The EA does not describe the conditions that fish inhabiting the project area need to survive, current habitat conditions, or the cumulative effects of the proposed action to fish and fish habitat when taken with other past, present, and reasonably foreseeable future activities in the project area.

Similarly, the EA does not discuss the current water quality status of the waterbodies in the project area, relative to state water quality standards. The EA states only that there could be a negative impact in the short-term, and a decrease in sediment is expected in the long-term (Page 49). The EA provides no quantitative data or information to support this conclusion, and therefore the reader cannot determine if the Forest Service has taken the requisite hard look at the effects of the proposed action to water quality. As such, it is impossible for the reader to tell if the proposed action complies with the Clean Water Act.

Throughout the EA, the document states that the analysis is tiered to the 2015 Land Management Plan (Forest Plan) for the Idaho Panhandle National Forests. The 2015 Forest Plan is a programmatic document that allocates the Forest Service land base on the IPNF to various management areas. The plan contains forest-wide goals, standards, and guidelines that apply to all management areas, and the plan also contains plan components that apply only to specific management areas. The Forest Plan is programmatic in nature. It does not authorize any site-specific management actions. While it is appropriate to reference the Forest Plan when citing relevant management direction, it is inappropriate to rely so heavily on the Forest Plan Environmental Impact Statement (EIS) for analysis purposes. Because the Forest Plan EIS did not authorize site-specific management actions, it does not relieve the Forest Service of its duty under NEPA to take a hard look at the site-specific effects of the Honey Badger Project.

As discussed with the wildlife section, the EA is generally devoid of references to the best available scientific information. There is a total of 34 references cited, the majority of which concern fire and fuels and none of which concern fish and wildlife or the effects of land management activities. The Forest Service must use the best available scientific information to show that its conclusions about the effects of the project are supported by research.

It is also hard to imagine that an environmental impact statement for the Honey Badger Project is not warranted. The IPNF used to prepare environmental impact statements for timber sales on the order of 3,000 to 4,000 acres. In comparison, the Honey Badger Project includes more than 12,000 acres of commercial timber harvest and 195 miles of road construction and reconstruction. What has changed to justify an EA now when an EIS was prepared for timber sales that were only one-quarter or one-third the size of the Honey Badger Project?

Finally, the Forest Service did not consider any alternatives to the proposed action. Had the agency adequately analyzed the effects of the proposed action, it may have found that alternative courses of action are necessary to comply with environmental laws or satisfy Forest Plan goals, standards, and guidelines for resources other than timber. The Forest Service must draft a more rigorous EIS, utilize the best available scientific information to support its claims, and consider alternative courses of action to comply with the Forest Plan and applicable environmental laws.

Wildlife

Analysis

It is very concerning that the Forest Service declined to analyze the effects if the Honey Badger Project to wildlife in detail (EA pages 20, 21). In declining to do so, the Forest Service suggests that "the impacts of the proposed action related to these issues are minimal or not relevant to the proposal or project area, or are already addressed in separate documentation." (page 20). Indeed, Project File W-028 provides a general summary of the Forest Service's views about the potential effects of the proposed action to a list of wildlife species. However, this summary is not the kind of rigorous analysis that we're accustomed to seeing in Forest Service NEPA documents.

For example, the Forest Service lumps together flammulated owl, fringed myotis, and pygmy nuthatch because these wildlife species are dependent upon similar habitat types (PF Doc. W-028, page 3). That's all well and good, but it is not clear that the Forest Service developed any effects indicators or performed a through quantitative analysis to support its conclusions about the effects of the proposed action to wildlife. With regard to these three species, the document states:

> *Project activities could result in temporary disturbance to individuals of this habitat group. Disturbance would include the potential removal of some cavities/trees available for nesting or roosting and possible displacement associated with harvesting and prescribed fire. These disturbances are of minor consequence given the mobility of these species, the silvicultural prescription to retain large trees and snags (particularly ponderosa pine and Douglas fir) and the post-treatment benefit of maintaining dry-site forest conditions beneficial to this group.*

(page 3).

The Forest Service makes this conclusion without calculating the amount of suitable habitat that could be affected by the project. Although there could be more information buried in the project files (which would have to be requested), it does not appear that the agency attempted to divide the project area up into hypothetical home ranges and develop and analyze effects indicators for many of the wildlife species that could potentially be implicated by the proposed action.

Similarly, Project File W-028 states with respect to fisher "In the short-term, there will be a decrease in the amount of capable habitat that may impact fisher habitat at a localized scale, but is not expected to significantly impact fisher populations due to the large home-range of this species, their mobility and the considerable amount of capable habitat in and near the project area." (page 4). The document does not disclose how many acres of capable habitat currently exist and how much habitat will be rendered unsuitable by the proposed action. As such, the Forest Service's conclusions about fisher, even if accurate, are not supported with quantitative analysis nor the available scientific literature.

The Forest Service must show its homework in the final environmental analysis. This is one of the largest timber sales ever proposed on the Idaho Panhandle National Forests. If the public is to understand and agree with the Forest Service's conclusions about the effects of the Honey Badger Project, then the agency must support its conclusions with quantitative analysis and the references to the best available scientific information. Moreover, the reader should readily be able to have access to

the information. It is unreasonable to bury information in the project files because the public does not know what additional information is contained in the record. We respectfully request that the Forest Service analyze the effects of the project to wildlife in detail and provide data, analysis, and references to the best available scientific information to support its conclusions in the final environmental analysis.

Grizzly bear

The Forest Service did not consider in detail the effects of the Honey Badger Project to grizzly bears. The agency's primary rationale is that the project area is too highly developed to support grizzly bears (EA, page 65). The Forest Service also explains that the project area is located outside of any designated grizzly bear recovery zones or critical habitat. The project area was historically inhabited by grizzly bears, and just because the Forest Service has allowed the lands that it manages in the project area to be heavily developed doesn't mean that the Honey Badger Project will not affect grizzly bears. Furthermore, just because the project area is not located in a designated recovery zone or in designated critical habitat does not mean that the project area is incapable of providing grizzly bear habitat.

The U.S. Fish and Wildlife Service's most recent map illustrating areas where grizzly bears may be present indicates that at least a portion of the Honey Badger Project is located in an area where grizzly bears could occur. In fact, a grizzly bear was captured near Rathdrum in recent years, in an area that is similarly developed. As such, the Forest Service should not only analyze the effects of the project to grizzly bears, but it should also consult with the U.S. Fish and Wildlife Service as required by the Endangered Species Act.

The effects analysis for grizzly bears should divide the Honey Badger Project area into polygons that are roughly equivalent to an average female grizzly bear home range. The Forest Service should then perform a "moving windows analysis" and compare metrics for open motorized route densities, total motorized route densities, and core habitat between the proposed action and no action alternatives. These metrics should then be compared to the available scientific literature for reaching conclusions about the effects of the project to grizzly bears.

Fish

The draft EA does not describe the current or historic distribution of fish species in the Honey Badger Project area. The Forest Service also neglected to describe current habitat conditions, relative to the conditions that are necessary to support healthy populations of native fish. Although the Forest Service used the Water Erosion Prediction Process to model sediment under the action and the no action alternatives, the EA does not present the results nor does the document describe the effects of the proposed action to fish and fish habitat. The final environmental analysis should include a complete fisheries section that addresses fish. Without this information, it is impossible for the public and the responsible official to weight the consequences of the action and the no action alternatives.

Water quality

As mentioned earlier, the draft EA does not describe the current water quality status of the waterbodies in the project area or applicable state water quality standards. The final environmental analysis must list all of the waterbodies in the project area and describe whether or not they are supporting

designated beneficial uses as required by the Clean Water Act. The analysis should list any sources of impairment and any obligations on the part of the Forest Service to reduce sources of water pollution as spelled out in approved Total Maximum Daily Loads (TMDLs). This analysis is critical to understanding the effects of the project to water quality and determining whether or not the Forest Service has complied with the Clean Water Act.

Also, the EA indicates that the proposed action will result in a reduction in the total miles of roads in the project area, and therefore, sediment generated by roads is expected to decrease (page 49). This assertion feels like a smoke screen. If you subtract the amount of system road decommissioning (-5 miles) and non-system road decommissioning (-10 miles) from the amount of new permanent road construction (+35 miles), then the net result is an increase of 20 miles. This does not even count the unauthorized (non-system) roads that will be officially added to the Forest service transportation system (+35 miles) or the non-system roads that will be reconstructed and added to the system (+15 miles). While recognize that there are 95 miles of existing system roads that will be placed into storage, these road prisms will remain on the landscape will not be totally hydrologically inert.

With regard to the WEPP analysis that the Forest Service performed, the EA states that the Forest Service modeled sediment generated by roads within 300 feet of stream channels. Roads greater than 300 feet from a steam channels were not included in the WEPP analysis because monitoring data indicates that these roads are too far away from stream channels to contribute to their sediment loads (page 46). This rationale makes sense. However, it does not appear that the Forest Service included trails within 300 feet of streams in its WEPP analysis. As with roads, trails probably generate variable amounts of sediment depending on the soil type, the width of the trail, the location of the trail, and the amount of use. Nevertheless, trails should be included in sediment models if they are located 300 feet of a stream channel. Trails designated for motor vehicle use are especially important to consider as off-road vehicles can cause high rates of erosion.

In summary the final environmental analysis should describe current water quality conditions in each of the four watersheds in the project area. The Forest Service should also describe applicable water quality standards. Sediment models should be updated to include sediment generated by timber harvest, roads, and trails. The analysis should then discuss the cumulative effects of the no action and the proposed action to water quality.

Wildland urban interface

The EA states that 85 percent of the project area is located in the Kootenai County Wildland Urban Interface (Page 6). There is a link in the Draft EA to a Forest Service-produced map of the Wildland Urban Interface (WUI), but the document does not describe how Kootenai County delineated the WUI. This omission would be particularly problematic if the Forest Service were planning to authorize the Honey Badger Project under the Healthy Forest Restoration Act (HFRA) as this authority contains specific criteria that must be met when the agency authorizes a project under the Act.

In this case, it appears that the Forest Service intends to authorize the Honey Badger Project under standard NEPA procedures. Nevertheless, the omission of any discussion regarding how Kootenai County delineated its WUI undermines rather than fosters informed environmental decision-making. Is

the reader to assume that all counties use the same criteria to define their WUI boundaries? On the contrary, counties all across the country have inconsistently delineated their WUI boundaries, and in many cases, counties have included large swaths of backcountry in their WUI boundaries for the sake of expediting logging operations far from homes and communities.

Although the Forest Service does not appear to be utilizing HFRA here, a discussion about Kootenai County's WUI delineation is relevant because one of the stated needs for the project is "to reduce hazardous fuels within the wildland urban interface and to manage forest vegetation in these areas in an effort to reduce the risk of large wildfires." (Page 6). As such, it is imperative for the public and the agency to understand how the WUI was delineated. Ideally Kootenai County will have used the best available information concerning existing fuel loads, fire behavior in applicable forest types, fire models, etc. in the delineation of its WUI boundaries. Whatever the case may be, it is impossible to read the draft EA and understand how the WUI boundary came to be.

The final environmental analysis should clearly explain how Kootenai County delineated its WUI boundaries. The Forest Service should also show which treatments are necessary to reduce the risk of fires to communities and land owners and which treatments are proposed for other purposes.

Travel management

The proposed action will result in several changes to the motor vehicle use map. Forest Service travel management regulations require the agency to minimize the effects of routes designate for public motor vehicle use to fish, wildlife, water quality, soil, and other natural resources. The travel management regulations also require the Forest Service to minimize conflicts between motor vehicle users and other recreationists. In the final environmental analysis, the Forest Service should describe how it complied with the travel management rule and demonstrate that the project minimizes effects to natural resources.

Silvicultural prescriptions

Old growth

ICL appreciates that no old growth stands will be logged in the Honey Badger Project Area. We also appreciate that the Forest Service has identified recruitment potential old growth for retention. The amount of old growth in the project area and across the IPNF is below the natural range of variability. The retention of old growth and recruitment potential old growth is necessary to achieve a natural range of old growth distribution across the IPNF.

Ecological forestry

The EA indicates that up to 2,400 acres of retention may occur in logging units as patches or buffer strips (page 32). ICL appreciates the fact that the Forest Service has incorporated concepts of ecological forestry in the project design. However, the amount of retention to occur in regeneration units as aggregates, patches, strips (5 to 20%), and even dispersed retention is less that recommended by Norm Johnson and Jerry Franklin, who pioneered these concepts on the west side of the Cascades. They specifically recommend retention of at least one-third of the original stand in patches, strips, or

aggregates where regeneration harvest is used. Pockets of retention should be well distributed across units, and simply counting riparian buffer strips toward the retention target is discouraged. In the final analysis, we encourage the Forest Service to provide more clarity concerning its goals and prescriptions for the retention of patches, strips, aggregates, dispersed retention and course woody debris.